

BEYS LISTON MOBARGHA & BERLAND LLP

Michael P. Beys

September 2, 2016

VIA ECF & FACSIMILE (212-805-4060)

The Honorable James C. Francis
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

*The within request is granted,
and bail is modified to permit
periodic travel to western Massachusetts
with advance approval of Pretrial
Services and consent of the govt.*

*SO ORDERED
Luka M. 9/6/16*

Re: *United States v. Kaleil Isaza Tuzman*, No. S1 15 Cr. 536 (PGG)

Dear Judge Francis:

We are counsel to defendant Kaleil Isaza Tuzman, who has been released on bail pursuant to bail orders signed by Magistrate Judge Frank Maas on July 15, 2016 (ECF 69) and modified on July 18, 2016 (ECF 77). He is currently on home detention, with travel restricted to the Southern District of New York. We respectfully submit this letter to seek permission for Mr. Isaza Tuzman to travel to Western Massachusetts on September 3, 2016 and to spend the Labor Day weekend with his family there. The government and Pretrial Services have no objection to this request.

Specifically, Mr. Isaza Tuzman requests permission to travel to Western Massachusetts by car on the morning of Saturday, September 3 and return by car on the evening of Tuesday, September 6, 2016. He would be traveling between family residences in Amherst, Hatfield, Holyoke and environs, and would stay in the home of a family member, or at a local hotel. He will provide the exact address where he will stay to his Pretrial Services Officer.

If this request is approved, Mr. Isaza Tuzman intends to spend time this weekend with his sister Intiya Isaza-Figueroa, his father, Luis Orlando Isaza, and his step-mother, Milagro Isaza-Figueroa, all of whom are co-signers on his bond. He also hopes to spend time with his mother, Ani Tuzman, his sister, Surya Isaza-Figueroa and his younger brother, Emmanuel Tuzman-Eagan. Emmanuel suffers from a physical affliction and has special needs. Mr. Isaza Tuzman is an important source of emotional and psychological support for him. Finally, Mr. Isaza Tuzman and his mother plan to have a joint psychotherapy session with Dr. Stephen Bradley, located at 8 Trumbull Road, Northampton, MA at 10:00 am on Tuesday, September 6, 2016. The defendant's court-approved mental health counselors here in New York have all suggested and strongly support the idea of a joint psychotherapy session with family.

Additionally, the Court should note that under the original, unmodified bail order – before he made arrangements to reside in Manhattan during his home detention – Mr. Isaza

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Tuzman was supposed "to reside with [his] father in Holyoke MA," with travel restricted to the District of Massachusetts (ECF 69); and the current, modified bail order contemplates that he will travel periodically to Massachusetts, subject to court approval (ECF 77).

This is the second request for the defendant to travel to Western Massachusetts to spend the weekend with family. He received permission to travel there the weekend of August 12, 2016, pursuant to Judge Pitman's endorsement of my letter of August 11, 2016 (ECF 101).

I have spoken with Pretrial Services Officer John Moscato, who is supervising Mr. Isaza Tuzman while on pretrial release, and he has no objection to this request. I have also communicated with Assistant U.S. Attorneys Damian Williams and Andrea Griswold, and the government also has no objection.

We thank the Court in advance for its consideration.

Respectfully Submitted,

/s/ Michael P. Beys

Michael P. Beys, Esq.
Counsel for Kaleil Isaza Tuzman

cc. Hon. Paul G. Gardephe, U.S.D.J. (via ECF)
All Counsel of Record (via ECF)
Officer John Moscato, U.S. Pretrial Services (via email)